

CHAITMAN LLP

Helen Davis Chaitman

Gregory M. Dexter

hchaitman@chaitmanllp.com

gdexter@chaitmanllp.com

Hearing Date: December 19, 2018

Hearing Time: 10:00 a.m.

Objection Date: December 12, 2018

*Attorneys for Defendants Carol Nelson,
Stanley Nelson, and Helen Saren-Lawrence*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant; and
STANLEY NELSON, individually and as joint tenant,

Defendants.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CAROL NELSON,

Defendant.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04377 (SMB)

Adv. Pro. No. 10-04658 (SMB)

Adv. Pro. No. 10-04898 (SMB)

Plaintiff,

v.

HELENE SAREN-LAWRENCE,

Defendant.

**NOTICE OF MOTION TO ADJOURN TRIAL DATES, *SINE DIE*, PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 16(b)(4)**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Helen Davis Chaitman, Esq. and the exhibits thereto, Defendants Helene Saren-Lawrence, Carol Nelson, and Stanley Nelson, by their undersigned counsel, respectfully move the Court for an entry of an Order adjourning the trial dates in the above captioned adversary proceedings, *sine die*, pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure, before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on December 19, 2018 at 10:00 a.m.

WHEREFORE, Defendants respectfully request that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: New York, New York
December 5, 2018

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman
Gregory M. Dexter
465 Park Avenue
New York, New York 10022
Phone & Fax: 888-759-1114
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com

*Attorneys for Defendants Carol Nelson,
Stanley Nelson, and Helen Saren-Lawrence*